

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

Mint Bank International, LLC and Guy Gentile Nigro

*Plaintiffs,*

v.

Office of the Commissioner of Financial Institutions of  
Puerto Rico

*Defendant.*

Case 3:18-cv-01441(WGY)

**RE: First Amendment,**  
**Injunctive Relief**

**JOINT REPORT OF PARTIES' PLANNING MEETING**

**TO THE HONORABLE COURT:**

**COME NOW**, Plaintiffs, Mint Bank International, LLC and Guy Gentile Nigro (collectively, “Plaintiffs”), and defendant Office of The Commissioner of Financial Institutions of Puerto Rico (“Defendant”), by and through their respective legal representatives, and very respectfully aver and pray as follows:

1. **Date of Meeting.** Pursuant to Fed. R. Civ. P. 26(f), a planning meeting was held on July 10, 2019, with the participation of the following attorneys: Adam Ford, Amanda Wetzel, Katarina Stipek, and Alejandro Santiago for Plaintiffs; and Rafael Fernández for Defendant.

2. **Pre-discovery Disclosures.** The parties have agreed to exchange, and did exchange, Initial Disclosures by July 22, 2019, as required by Fed. R. Civ. P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

a. The parties will exchange Document Demands by **August 5<sup>th</sup>, 2019**.

b. The parties will have until **August 19<sup>th</sup>, 2019**, to notify interrogatories or any other written discovery.

c. The parties will take all depositions, between **November 4<sup>th</sup> and November 15<sup>th</sup>, 2019**, subject to witness availability. If necessary, the following dates have been blocked for depositions: **December 2 – 13, 2019**.

d. The parties expect to have completed all discovery, and any pending or remaining deposition, **by December 13<sup>th</sup>, 2019**.

e. The parties agree that dispositive motions, if any, shall be filed by **February 21<sup>st</sup>, 2020**. If a dispositive motion is filed, the opposing party shall have the terms provided by the Federal Rules of Civil Procedure to file the corresponding response.

**4. Other Items.**

a. The Scheduling Conference is set for **July 31<sup>st</sup>, 2019**.

b. The parties shall entertain the possibility of an amicable resolution of this action.

**WHEREFORE**, the appearing parties respectfully request that this Court take notice of the foregoing, approve the above discovery plan and proposed deadlines, and consequently issue the corresponding case management order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 24<sup>th</sup> day of July, 2019.

/s/ Adam C. Ford

Adam C. Ford, Esq. (*admitted pro hac vice*)  
FORD O'BRIEN LLP  
575 Fifth Avenue, FL 17  
New York, New York 10017  
[aford@fordobrien.com](mailto:aford@fordobrien.com)  
Tel.: (212) 858-0040

Adsuar Muñiz Goyco  
Seda & Pérez-Ochoa, PSC  
208 Ponce de León Ave., Suite 1600  
San Juan, PR 00918  
Phone: (787) 281-1952 / Fax (787) 756-9010

/s/ Katarina Stipek-Rubio

Katarina Stipek Rubio, Esq.  
USDCPR No. 206611  
[kstipec@amgprlaw.com](mailto:kstipec@amgprlaw.com)

/s/ Alejandro Santiago-Martínez

Alejandro Santiago Martínez, Esq.  
USDCPR No. 304002  
[asantiago@amgprlaw.com](mailto:asantiago@amgprlaw.com)  
*Counsel for Plaintiffs*

/s/ Rafael Fernández Castañer

Rafael Fernández Castañer, Esq.  
Federal Litigation Division  
Department of Justice  
P.O. Box 9020192  
San Juan, PR 00902-0192  
Phone: (787) 721-2900 Ext.: 1423  
[rfernandez@justicia.pr.gov](mailto:rfernandez@justicia.pr.gov)